#### IN THE UNITED STATES DISTRICT COURT

#### FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : CRIMINAL NO. \_\_\_\_\_

v. : DATE FILED: \_\_\_\_\_

ROBBIN MARIE WRIGHT : VIOLATIONS:

18 U.S.C. § 2113(a) (bank robbery –

: 2 counts)

18 U.S.C. § 2 (aiding and abetting)

Notice of Additional Factors

# **INFORMATION**

## **COUNT ONE**

#### THE UNITED STATES ATTORNEY CHARGES THAT:

On or about November 18, 2003, at Fairless Hills, Pennsylvania, in the Eastern District of Pennsylvania, defendant

#### **ROBBIN MARIE WRIGHT**

knowingly, by force and violence, and by intimidation, took, and did aid and abet the taking, from employees of Wachovia Bank, 951 Trenton Road, United States currency, that is, approximately \$1,967 belonging to, and in the care, custody, control, management, and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

## **COUNT TWO**

## THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

On or about January 12, 2004, at Cinnaminson, New Jersey, in the District of New Jersey, defendant

## **ROBBIN MARIE WRIGHT**

knowingly, by force and violence, and by intimidation, took, and did aid and abet the taking, from employees of Wachovia Bank, 2802 US Route 130, United States currency, that is, approximately \$1,170 belonging to, and in the care, custody, control, management, and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

## NOTICE OF ADDITIONAL FACTORS

## THE UNITED STATES ATTORNEY FURTHER CHARGES THAT:

1. In committing the offenses charged in Counts One and Two of this information, defendant ROBBIN MARIE WRIGHT:

a. Committed offenses in which the property of financial institutions was taken, as described in U.S.S.G. § 2B3.1(b)(1).

PATRICK L. MEEHAN United States Attorney